

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

GLENNA HENDRICKS,)	
)	
Plaintiff,)	
)	
v.)	CAUSE NO: 1:21-cv-221
)	
BKD TWENTY-ONE MANAGEMENT)	
COMPANY, INC.,)	
)	
Defendant.)	

COMPLAINT AND DEMAND FOR JURY TRIAL

1. Plaintiff, Glenna Hendricks (“Hendricks”), brings this action against Defendant, BKD Twenty-One Management Company, Inc. (“Defendant”), for violation of her rights as protected by Title VII of the Civil Rights Act of 1964 (“Title VII”) and the Age Discrimination in Employment Act (“ADEA”).

PARTIES

2. Hendricks has resided within the Southern District of Indiana at all relevant times.
3. Defendant is a Corporation operating within the Southern District of Indiana.

JURISDICTION AND VENUE

4. This Court has jurisdiction pursuant to 42 U.S.C. § 2000e-5(f)(3), 29 U.S.C. § 626(c), and 29 U.S.C. § 794a.
5. Venue is proper in this Court pursuant to 28 U.S.C. § 1391, as all facts, events, and transactions giving rise to this lawsuit occurred in Marion County, Indiana, which is located in the Southern District of Indiana, Indianapolis Division.

FACTUAL ALLEGATIONS

6. Hendricks is a Sixty-Five (65) year old woman.
7. Hendricks began working for Defendant, a senior living community management corporation, on May 12, 2015.
8. At all relevant times, Hendricks' position with Defendant was Staff Social Worker.
9. At all relevant times, Hendricks' work performance met Defendant's reasonable expectations.
10. In 2020, Hendricks was disciplined for alleged conduct that similarly situated younger and/or male employees were not disciplined for. By way of non-exclusive example, Tiffany (LNU) regularly violated Defendant's policies yet was not disciplined.
11. Defendant disciplined Hendricks because of her age and because of her sex.
12. Hendricks' younger supervisor attempted to blame Hendricks for the supervisor's own mistakes. By way of non-exclusive example, Hendricks timely submitted a report to her supervisor, but the supervisor was not available and then blamed Hendricks for allegedly failing to turn in the report, even though the report had been submitted in the customary way.
13. On August 14, 2020, Hendricks was terminated.
14. Defendant did not follow its own progressive discipline policy when it terminated Hendricks.
15. Hendricks was replaced by a younger, male individual. On information and belief, Defendant had already planned to hire this individual before Hendricks was even terminated and before the alleged actions that Defendant cited in her termination took

place.

16. Defendant terminated Hendricks because of her age and because of her sex.
17. Similarly situated younger and/or male employees received more favorable treatment by the Defendant.
18. Any reason given by Defendant for the adverse actions it took against Hendricks is pretextual.
19. Defendant violated Hendricks' rights as protected by Title VII and the ADEA.
20. As a result of Defendant's unlawful actions, Hendricks has suffered and continues to suffer damages.

CAUSES OF ACTION

Count I - Sex Discrimination - Title VII

21. Hendricks incorporates by reference paragraphs 1-20 of her Complaint.
22. Defendant disciplined and terminated Hendricks because of her sex.
23. Defendant's actions were intentional, willful, and in reckless disregard of Hendricks' rights as protected by Title VII.
24. Hendricks has been injured as a result of Defendant's unlawful actions.

Count II - Age Discrimination - ADEA

25. Hendricks incorporates by reference paragraphs 1-24 of her Complaint.
26. Defendant disciplined and terminated Hendricks because of her age.
27. Defendant's actions were intentional, willful, and in reckless disregard of Hendricks' right's as protected by the ADEA.
28. Hendricks has been injured as a result of Defendant's unlawful actions.

REQUESTED RELIEF

WHEREFORE, Plaintiff, Glenna Hendricks, by counsel, respectfully requests that the Court find for her and order that Defendant:

1. Reinstatement Hendricks to the same or sought after position with the requisite salary, seniority, and benefits, or pay front pay and benefits in lieu of reinstatement;
2. Pay lost wages and benefits to Hendricks;
3. Pay compensatory damages to Hendricks;
4. Pay pre- and post-judgment interest to Hendricks;
5. Pay Hendricks' attorney fees and costs incurred in litigating this action; and
6. Provide to Hendricks all other legal and equitable relief that the Court finds appropriate.

Respectfully submitted,

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DEMAND FOR JURY TRIAL

Plaintiff, Glenna Hendricks, by counsel, respectfully requests a jury trial for all issues deemed triable.

Respectfully submitted,

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